

EXHIBIT Q



VERIZON SECURITY SUBPOENA COMPLIANCE

180 WASHINGTON VALLEY ROAD

BEDMINSTER NJ 07921

Phone: 800-451-5242 Fax: 888-667-0028

VERIZON CONFIDENTIAL

October 11, 2024

GREENSPOON MARDER LLP
200 E BROWARD BLVD STE 1800
FORT LAUDERDALE FL 33301

Verizon Case #: 24534925
Docket / File #: 1:24-cv-00187-PAB
Requested Target: 220-203-8888

Dear Roy Taub:

Verizon Subpoena Compliance is in receipt of the attached request. Please note the following:

(x) **Billable/Answered calls off the statement are all that is available for the time frame of the request.**

(x) **No records found associating Joseph Allen Davis to phone # 220-203-8888**

RECORDS PAST RETENTION :

(x) Text (non-content) or Picture Detail (includes originating/terminating telephone numbers and the date/time) of the activity. This report is only maintained for the last 365 days and does *not* include content of the text or pictures.

(x) Verizon Wireless Call Detail (includes originating/terminating telephone numbers, the date/time of the call, and includes unanswered, restricted or unavailable calls). This report is only maintained for the past 365 days. If the time frame requested is for any period prior to the last 365 days, calls as originally reflected on billing statements will be provided.

(x) Data/internet usage with IP Sessions is only maintained for the last 365 days.

(x) Tower location information is only maintained for the last 365 days

Respectfully,

JANET M.
VERIZON SECURITY SUBPOENA COMPLIANCE

Enclosed

To:

Page: 2 of 6

2024-09-24 13:53:59 EDT

19543334167

From: Cheryl Cochran

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

Northern District of Ohio

JOSEPH ALLEN DAVIS

Plaintiff

v.

CLEAR HEALTH LLC

Defendant

Civil Action No. 1:24-cv-00187-PAB

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To:

Verizon
Attn: VSAT, 180 Washington Valley Road, Bedminster, NJ 07921 (via fax 888-667-0028)

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See attached Schedule "A" and Declaration of Authenticity

Place: 200 E. Broward Blvd., Suite 1800, Ft. Lauderdale, FL
33301 or electronic delivery to roy.taub@gmlaw.com

Date and Time:

10/15/2024 5:00 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 09/24/2024

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party)

Clear Health LLC

, who issues or requests this subpoena, are:
Roy Taub, Greenspoon Marder LLP, 200 E. Broward Blvd., #1800, Ft. Lauderdale, FL 33301; roy.taub@gmlaw.com;
(954)491-1120

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

EXHIBIT A TO SUBPOENA

1. Documents sufficient to identify all subscribers or users known by You to be associated with telephone number (220) 203-8888, including the dates on which the telephone number was assigned to or began to be associated with each subscriber or user.
2. In the event the telephone number (220) 203-8888 was ported from another wireless telephone carrier, Documents sufficient to identify the wireless telephone carrier from which the telephone number (220) 203-8888 was ported to You and the date that occurred.
3. Documents sufficient to identify the current subscriber of the telephone number (220) 203-8888.
4. Documents sufficient to identify the date telephone number (220) 203-8888 was assigned to its current subscriber.
5. Documents sufficient to identify the subscriber associated with the telephone number (220) 203-8888 on September 7, 2023.
6. Documents sufficient to associate the telephone number (220) 203-8888 with Plaintiff Joseph Allen Davis.
7. Documents sufficient to demonstrate the earliest date the telephone number (220) 203-8888 was associated with or assigned to Plaintiff Joseph Allen Davis.
8. Call detail records, call logs, and the call history for September 7, 2023 for the telephone number (220) 203-8888.
9. GPS, cell site, cell tower, or any other geographic location information related to the history provided in response to Document Request No. 1
10. Documents which reflect every internet protocol ("IP") address associated with the device(s) linked to telephone number (220) 203-8888 from April 2023 through September 2023.



VERIZON SECURITY SUBPOENA COMPLIANCE

180 WASHINGTON VALLEY ROAD

BEDMINSTER NJ 07921

Phone: 800-451-5242 Fax: 888-667-0028

October 11, 2024

GREENSPOON MARDER LLP
200 E BROWARD BLVD STE 1800
FORT LAUDERDALE FL 33301

Verizon Case #: 24534925
Docket / File #: 1:24-cv-00187-PAB

State of Texas

ss:

County of Tom Green

I, JANET MOLDER, being duly sworn, depose and say:

I am the custodian of records for Verizon, and in that capacity, I certify that the attached records are true and accurate copies of the records created from the information maintained by Verizon in the actual course of business. It is Verizon's ordinary practice to maintain such records, and that said records were made contemporaneously with the transaction and events stated therein, or within a reasonable time thereafter.

/s/ JANET MOLDER

Certification following USCS Federal Rules of Evidence Rule 902 & 803.

PO BOX 489
NEWARK, NJ 07101-0489

Account: 226591380-00001

Invoice: 8561253281

Billing period: Aug 25 - Sep 24, 2023

KEYLINE



SARAH MORRIS
108 SCOTLAND BLVD
ONTARIO, OH 44906-2239

Account: 226591380-00001

Invoice: 8561253281

Billing period: Aug 25 - Sep 24, 2023

Talk activity (cont.)

Sarah Morris
220-203-8888
MOTOROLA EDGE 5G UW

Date	Time	Number	Origination	Destination	Min.	Airtime Charges	LD/Other Charges	Total
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Sep 6	5:07 PM							
Sep 7	5:18 AM	614-359-5736	Lexington, OH	Columbus, OH	1	--	--	--
Sep 7	5:18 AM	614-359-5736	Lexington, OH	Columbus, OH	1	--	--	--
Sep 7	5:20 AM	614-359-5736	Lexington, OH	Columbus, OH	13	--	--	--
Sep 7	6:20 AM	419-544-1164	Columbus, OH	Mansfield, OH	1	--	--	--
Sep 7	7:30 AM	614-688-4357	Columbus, OH	Columbus, OH	10	--	--	--
Sep 7	7:45 AM	419-775-6455	Columbus, OH	Mansfield, OH	3	--	--	--
Sep 7	7:46 AM	614-460-9893	Columbus, OH	Incoming, CL	1	--	--	--
Sep 7	7:47 AM	614-460-9893	Columbus, OH	Columbus, OH	1	--	--	--
Sep 7	8:37 AM	614-688-2528	Columbus, OH	Columbus, OH	2	--	--	--
Sep 7	8:53 AM	419-775-6455	Columbus, OH	Mansfield, OH	5	--	--	--
Sep 7	8:57 AM	800-480-2265	Columbus, OH	Toll-Free, CL	3	--	--	--
Sep 7	9:01 AM	800-480-2265	Columbus, OH	Incoming, CL	1	--	--	--
Sep 7	9:01 AM	800-480-2265	Columbus, OH	Toll-Free, CL	4	--	--	--
Sep 7	9:06 AM	800-480-2265	Columbus, OH	Incoming, CL	10	--	--	--
Sep 7	9:08 AM	614-293-5000	Columbus, OH	Incoming, CL	2	--	--	--
Sep 7	9:16 AM	419-775-6455	Columbus, OH	Mansfield, OH	3	--	--	--
Sep 7	9:25 AM	614-292-2950	Columbus, OH	Columbus, OH	1	--	--	--

Account: 226591380-00001**Invoice:** 8561253281**Billing period:** Aug 25 - Sep 24, 2023**Talk activity (cont.)****Sarah Morris****220-203-8888****MOTOROLA EDGE 5G UW**

Date	Time	Number	Origination	Destination	Min.	Airtime Charges	LD/Other Charges	Total
Sep 7	9:26 AM	614-247-9218	Columbus, OH	Columbus, OH	12	--	--	--
Sep 7	9:39 AM	419-775-6455	Columbus, OH	Mansfield, OH	2	--	--	--
Sep 7	9:44 AM	614-688-2528	Columbus, OH	Incoming, CL	27	--	--	--
Sep 7	9:50 AM	419-775-6455	Columbus, OH	Incoming, CL	1	--	--	--
Sep 7	10:14 AM	419-775-6455	Columbus, OH	Mansfield, OH	27	--	--	--
Sep 7	10:21 AM	220-213-4481	Columbus, OH	Incoming, CL	1	--	--	--
Sep 7	11:53 AM	330-583-8485	Columbus, OH	Incoming, CL	1	--	--	--
Sep 7	11:54 AM	330-583-8485	Columbus, OH	Greene, OH	1	--	--	--
Sep 7	12:06 PM	614-292-6677	Columbus, OH	Columbus, OH	1	--	--	--
Sep 7	12:26 PM	614-292-6677	Columbus, OH	Columbus, OH	1	--	--	--
Sep 7	12:28 PM	614-688-1133	Columbus, OH	Columbus, OH	1	--	--	--
Sep 7	12:28 PM	614-582-6561	Columbus, OH	Incoming, CL	3	--	--	--
Sep 7	12:59 PM	614-460-9893	Columbus, OH	Incoming, CL	1	--	--	--
Sep 7	1:18 PM	614-247-4999	Columbus, OH	Columbus, OH	2	--	--	--
Sep 7	1:28 PM	614-806-9498	Columbus, OH	Columbus, OH	3	--	--	--
Sep 7	1:44 PM	614-460-9893	Columbus, OH	Incoming, CL	2	--	--	--
Sep 7	3:03 PM	220-200-9804	Columbus, OH	Incoming, CL	1	--	--	--
Sep 7	3:14 PM	220-200-9887	Columbus, OH	Incoming, CL	1	--	--	--
Sep 7	3:14 PM	220-200-9887	Columbus, OH	Fazeysbg, OH	1	--	--	--
Sep 7	3:15 PM	220-200-9804	Columbus, OH	Fazeysbg, OH	1	--	--	--
Sep 7	3:36 PM	419-775-6455	Columbus, OH	Mansfield, OH	13	--	--	--
Sep 7	5:28 PM	220-226-8182	Columbus, OH	Incoming, CL	1	--	--	--
Sep 7	5:29 PM	220-200-9804	Columbus, OH	Fazeysbg, OH	1	--	--	--
Sep 7	7:25 PM	419-775-6455	Columbus, OH	Mansfield, OH	5	--	--	--
Sep 8	9:28 AM							

Search Value	MTN	Account Number	Last Name	First Name	Business Name	MTN Status Code	MTN Status Effective Date	MTN Effective Date	Disconnect Date
2202038888	2202038888	226591380-1	MORRIS	SARAH		D	3/10/2024	1/25/2023	3/10/2024



Verizon Security Assistance Team (VSAT)
180 Washington Valley Road | Bedminster, NJ 07921
Phone: 800-451-5242 | Fax: 888-667-0026, 888-667-0028

Toll Explanation (Call Records from Billing Statements)

Date & Time	Number	Rate	Usage Type	Origination	Destination	Min.	Airtime Charges	Long/Dist/ Other Chgs	Total
This column shows the date and time the call began.	Telephone Number dialed by Customer OR Telephone Number that dialed Customer	This column identifies what rate will be applied from the line's calling plan.	This column distinguishes what type of usage will be applied from the line's calling plan.	This column identifies the geographical area for which the line is being charged when placing or receiving a call.** If "Wi-Fi" is listed, the call was made over a Wi-Fi network.	On outbound calls, this column will show the home area of the telephone number being called. ** VMDeposit indicates an outbound call where the target phone number has reached the voicemail of the phone number reflected in the Number column.	This is the duration of the call in minutes. This number is rounded UP to the next full minute.	If applicable: Charges associated with roaming will be reflected here.	If applicable: Long distance or other associated charges will be reflected here.	If applicable: This column will reflect the cumulative charges associated on the call reflected in the Airtime Charges and Long Distance/ Other charges columns.
The time of the call is rounded DOWN to the nearest full minute.									
The time zone of the call transaction should be local to the city/state found in the origination column.	"Unavailable" will be shown when the calling party number is not able to be identified.				Incoming, CL indicates an incoming call from the telephone number shown in the Number column.				
The time zone for Wi-Fi calls cannot be confirmed.									

Note: Only "billable" connected calls are reflected. These records do not include calls to 911, 611, unanswered incoming calls, or any calls deemed "not billable".

****The information listed in the Origination and Destination columns is compiled for billing and pricing purposes and does not contain any definitive statement of the user's location at the time when the communication was made.**

Proprietary & Confidential Statement: This document and the information disclosed within, including the document structure and contents, are confidential and the proprietary property of Verizon and are protected by patent, copyright and other proprietary rights. Any disclosure to a third party in whole or in part in any manner is expressly prohibited without the prior written permission of Verizon.